

EXHIBIT 14



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Transcript of Tranquillo Villegas

Date: July 28, 2022

Case: Timbers -v- Telligent Masonry, LLC, et al.

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<p>33</p> <p>1 A Not other than what I read.</p> <p>2 Q But you yourself prior to Mr. Timbers</p> <p>3 being fired were not aware of anything?</p> <p>4 A No.</p> <p>5 Q Were you aware at all that Mr. Timbers had</p> <p>6 worked and left and worked and left and worked and</p> <p>7 left Telligent? You're not aware of that?</p> <p>8 A No.</p> <p>9 Q Is that something that happens a lot in</p> <p>10 your industry? Masons come, masons go, masons</p> <p>11 come back, masons go?</p> <p>12 A Yes.</p> <p>13 Q Is it unusual for a mason to come to</p> <p>14 Telligent, work some and then maybe go work for</p> <p>15 another masonry company and then when that job is</p> <p>16 done come back to Telligent?</p> <p>17 A Yes.</p> <p>18 Q Happens a lot?</p> <p>19 A Yes.</p> <p>20 Q Nothing unusual about that?</p> <p>21 A No.</p> <p>22 Q Mr. Valladares said in one of the e-mails,</p>	<p>35</p> <p>1 A Don't remember.</p> <p>2 Q And according to the information we have</p> <p>3 provided, a number of masons at the Faraday site</p> <p>4 were told to go to the Gainesville Prince William</p> <p>5 High School site, are you aware of that?</p> <p>6 A Yes.</p> <p>7 Q Were you aware at the time that was</p> <p>8 happening?</p> <p>9 A No.</p> <p>10 Q When did you learn that there had been</p> <p>11 that reassignment of masons?</p> <p>12 A In our weekly meeting.</p> <p>13 Q So that would have happened -- could that</p> <p>14 have happened the following week?</p> <p>15 A Correct.</p> <p>16 Q When typically are the weekly meetings?</p> <p>17 A Tuesdays.</p> <p>18 Q In the morning I guess?</p> <p>19 A At 1:00.</p> <p>20 Q At 1:00?</p> <p>21 A (No oral response.)</p> <p>22 Q So if that happened Thursday, Friday you</p>
<p>34</p> <p>1 and we'll look at that in a little bit, that the</p> <p>2 Timbers family were troublemakers.</p> <p>3 You may have read that but did anyone have</p> <p>4 any conversation with you about the Timbers family</p> <p>5 at all?</p> <p>6 A No.</p> <p>7 Q Other than -- and I'm going to ignore</p> <p>8 September 23rd when there's a bunch of e-mails</p> <p>9 about Mr. Timbers.</p> <p>10 Prior to that did anyone have any</p> <p>11 conversations with you about Mr. Timbers?</p> <p>12 A No.</p> <p>13 Q Through the documentation we have and</p> <p>14 through the evidence that we've seen, it appears</p> <p>15 that at one point in August, and specifically</p> <p>16 looking at August 20th, 21st, that work at --</p> <p>17 masonry work at Faraday stopped we believe because</p> <p>18 of some window issue perhaps.</p> <p>19 Are you aware of there being a time where</p> <p>20 Faraday had to be put on hold for a few days?</p> <p>21 A Yes.</p> <p>22 Q Do you know why?</p>	<p>36</p> <p>1 would have found out about that reallocation at</p> <p>2 the following Tuesday weekly meeting?</p> <p>3 A Yes.</p> <p>4 Q Were you involved at all in that decision?</p> <p>5 A No.</p> <p>6 Q Had you ever had any conversations with</p> <p>7 Mr. Valladares about Mr. Timbers, David Timbers</p> <p>8 prior to Mr. Timbers being fired?</p> <p>9 A No.</p> <p>10 Q Do you recall having any conversations at</p> <p>11 all with Mr. Valladares again prior to Mr. Timbers</p> <p>12 being fired about the Timbers family?</p> <p>13 A No.</p> <p>14 Q Any family members of Timbers'?</p> <p>15 A No.</p> <p>16 Q Do you know how long work was stopped at</p> <p>17 Faraday in August of 2020?</p> <p>18 A No.</p> <p>19 Q We have been provided in discovery your</p> <p>20 phone records which indicate that on December 16,</p> <p>21 2020 you received two phone calls from</p> <p>22 Mr. Timbers.</p>

<p>41</p> <p>1 Q Is it fair to say that's a very rare 2 occurrence?</p> <p>3 A Yes.</p> <p>4 Q And from your recollection may have 5 happened how many times?</p> <p>6 Since you've been there how many times has 7 that -- are you aware that a mason has been sent 8 off not to return?</p> <p>9 A Don't remember.</p> <p>10 Q Rare?</p> <p>11 A Yes.</p> <p>12 Q You would say it's rare?</p> <p>13 A Yes.</p> <p>14 Q Unusual?</p> <p>15 A Yes.</p> <p>16 Q Maybe five times, less than?</p> <p>17 A Maybe.</p> <p>18 Q But not more than five?</p> <p>19 A No, we --</p> <p>20 Q Work them?</p> <p>21 A Yes.</p> <p>22 Q You work them. If a mason is</p>	<p>43</p> <p>1 Q Are there any training schools for masons?</p> <p>2 A Yes.</p> <p>3 Q Do you send information to the training 4 schools?</p> <p>5 A No.</p> <p>6 Q Is there some form of apprentice program 7 for masons that you're aware of?</p> <p>8 A We have our own program.</p> <p>9 Q So someone could come in with no 10 experience and you would try to teach them to be a 11 mason?</p> <p>12 A Yes.</p> <p>13 Q Is it usual for -- you have laborers who 14 move brick and do things like that, correct?</p> <p>15 A Yes.</p> <p>16 Q Do those persons ever get trained to 17 become masons?</p> <p>18 A Yes.</p> <p>19 Q Is that a usual thing, unusual thing?</p> <p>20 A Everyday.</p> <p>21 Q Is it usual or unusual for someone to be a 22 laborer and just stay as a laborer during their</p>
<p>42</p> <p>1 inconsistent, if he shows up, doesn't show up, 2 shows up you guys still will work him when he 3 shows up, correct?</p> <p>4 A Yes.</p> <p>5 Q And as you indicated, you're not aware of 6 anybody ever being terminated because they got 7 into a fight with another mason?</p> <p>8 A No.</p> <p>9 Q Did Mr. Valladares ever tell you that he 10 did not want Mr. David Timbers working on a site 11 where Valladares was the Foreman?</p> <p>12 A No.</p> <p>13 Q How does Telligent find masons?</p> <p>14 A They call. They call the office. They 15 call our Foreman. They call our Superintendent. 16 They call me.</p> <p>17 Q So is there anything Telligent does to 18 recruit masons, to find masons, advertise for 19 masons?</p> <p>20 A Yes.</p> <p>21 Q What do they do?</p> <p>22 A It's an app on the web and we --</p>	<p>44</p> <p>1 time with Telligent?</p> <p>2 A Yes.</p> <p>3 Q So some people are just laborers and some 4 people are masons and some people may be laborers 5 who try to become trained as masons?</p> <p>6 A Yes.</p> <p>7 Q You're aware that on September 23rd -- do 8 you know who Tia Taylor is or was?</p> <p>9 A Yes.</p> <p>10 Q I guess she still is.</p> <p>11 A Yes.</p> <p>12 Q To your understanding who was she?</p> <p>13 A H.R.</p> <p>14 Q Are you aware that she had a conversation 15 with David Timbers on September 23rd?</p> <p>16 A From what I read, yes.</p> <p>17 Q Are you aware that Ms. Tia Taylor 18 undertook an investigation on September 23rd?</p> <p>19 A From what I read, yes.</p> <p>20 Q Did she call you on the 23rd about 21 Mr. Timbers?</p> <p>22 A I don't recall.</p>

<p>49</p> <p>1 Q How do you find out about it?</p> <p>2 A From safety or from e-mails.</p> <p>3 Q But you don't recall anything specific</p> <p>4 about a claim of Mr. Timbers being injured on the</p> <p>5 job site?</p> <p>6 A No.</p> <p>7 MR. TOLAND: Mark this as Exhibit 2. This</p> <p>8 is for those playing along at home Telligent Bates</p> <p>9 number 89 and 90. This will be Exhibit 2.</p> <p>10 (Villegas Deposition Exhibit 2 was marked</p> <p>11 for identification and attached to the</p> <p>12 transcript.)</p> <p>13 BY MR. TOLAND:</p> <p>14 Q Let me know when you're done looking it</p> <p>15 over.</p> <p>16 (Pause in the proceedings.)</p> <p>17 A Okay.</p> <p>18 Q Do you recall seeing this form before?</p> <p>19 A No.</p> <p>20 Q And you don't recall seeing this form as</p> <p>21 part of an e-mail that was sent to you?</p> <p>22 A I don't remember.</p>	<p>51</p> <p>1 everything that David Timbers builds -- this is on</p> <p>2 page two if you want to follow along. It's on</p> <p>3 Bates number 90. It states that "everything David</p> <p>4 builds must be torn back down and rebuilt."</p> <p>5 Had anybody ever mentioned anything to you</p> <p>6 that work that David Timbers builds has to be torn</p> <p>7 back down and rebuilt?</p> <p>8 A After all this happened I learned this by</p> <p>9 Jose but before that --</p> <p>10 Q Prior to that no?</p> <p>11 A No.</p> <p>12 Q Did you ever get a complaint from any</p> <p>13 Foreman prior to him being terminated that</p> <p>14 Timbers' work needed to be torn down and rebuilt?</p> <p>15 A No.</p> <p>16 Q Did you ever get any complaint relayed to</p> <p>17 you from any of your supervisors that Mr. Timbers'</p> <p>18 work needed to be torn down and rebuilt?</p> <p>19 A No.</p> <p>20 Q Never got any complaint about Mr. Timbers</p> <p>21 at all from anybody prior to him being terminated,</p> <p>22 correct?</p>
<p>50</p> <p>1 Q Did you ever have any conversations with</p> <p>2 Jose Valladares about the claim -- about</p> <p>3 Mr. Timbers' claim that Jose Valladares was</p> <p>4 refusing Mr. Timbers and his brother's work</p> <p>5 because they were African-Americans?</p> <p>6 A No.</p> <p>7 Q Did you ever hear prior to Mr. Timbers</p> <p>8 being terminated that he was going to report the</p> <p>9 company to the Labor Board?</p> <p>10 A No.</p> <p>11 Q Did you ever hear prior to Mr. Timbers</p> <p>12 being terminated that he was going to make a</p> <p>13 complaint to the EEOC?</p> <p>14 A No.</p> <p>15 Q And you don't recall having any</p> <p>16 conversations about Mr. Timbers with anybody on</p> <p>17 the 23rd?</p> <p>18 A No.</p> <p>19 Q You don't even recall seeing the e-mails,</p> <p>20 do you?</p> <p>21 A No.</p> <p>22 Q There's a statement in here that</p>	<p>52</p> <p>1 A Correct.</p> <p>2 Q If there was a problem with an employee</p> <p>3 whose work constantly needed to be torn down and</p> <p>4 rebuilt, is that something that would have been</p> <p>5 reported to your Superintendents?</p> <p>6 A Yes.</p> <p>7 Q Is that something your Superintendents</p> <p>8 would have reported to you?</p> <p>9 A Not necessarily but yes.</p> <p>10 Q If a Superintendent found out that</p> <p>11 someone's work constantly needed to be torn down</p> <p>12 and rebuilt, what were they supposed to do?</p> <p>13 A Try to teach them the right way.</p> <p>14 Q But you're not aware of any conversations</p> <p>15 about the quality of Mr. Timbers' work?</p> <p>16 A No.</p> <p>17 Q In this there's also a suggestion that</p> <p>18 Mr. Valladares had been threatened by Mr. Timbers</p> <p>19 three times in the past few weeks.</p> <p>20 What is a Foreman supposed to do if</p> <p>21 somebody threatens him with violence?</p> <p>22 A Let his Superintendent know.</p>